

Dear FCC:

This filing is submitted as comments on ARRL's Petition for Rule Making to regulate amateur bands by bandwidth rather than by mode.

Modern radio communication enjoys the benefits of modulation and coding techniques that address the nature of the channel and the communication requirement. We note in particular the FCC's move to require digital television and radio broadcast in the commercial segments with the goal to phase out older, less appropriate technologies. Cellular telephone and wideband RF internet access communication employs various phase shift keying, quadrature amplitude modulation, orthogonal frequency division multiplexing and code division multiple access along with suitable data encoding, error correction and data compression techniques designed specifically for the communication channel and the data throughput required.

Contrast this to the amateur band mode-identified permissible operation. A salient example is "RTTY", an acronym for Radio TeleType employing frequency shift keying modulation and an asynchronous symbol format. This designation is unnecessarily restrictive and, without specific FCC clarification for each case, impedes amateur experimentation in the digital modulation techniques such as those that are employed in the commercial segments. The "RTTY" designation is not only old, it identifies a technology that is decades behind current communication technology. It is not present in today's communication vocabulary.

Therefore, as the commercial segment is being modernized, so should the amateur segment. ARRL's petition should be given most serious consideration.

John J. Nemec, Ph.D., NS6Z
nemec@arraycomm.com